

**FILED**

1/19/2017

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

DEC 19 2016

THOMAS G. BRUTON

CLERK, U.S. DISTRICT COURT

Ardamis Darrell Sims

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

Judge Virginia M Kendall

vs.

Case No: 16 C 10768

(To be supplied by the Clerk of this Court)

United State Marshal Edward Gilmore

United State Marshal deputy director

David Harlow, Thompson, J,

"Sledge, E," Cundiff, M, "Gonzalez N"

"Grimaldo, D" Zitsch, P, "Heller, J" #21002

Coleman LR #1233, Tracy, JL #16173

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

Munizzi, AF #15447  
IGNOWSKI, JS #20052  
Hoffman, John #20077  
Vargas, T #10331  
Murphy BC #10545

CHECK ONE ONLY:

AMENDED COMPLAINT

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

✓ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: Ardamis Sims
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: 20141221052
- D. Place of present confinement: Cook County Jail
- E. Address: P.O. Box 089002

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Edward Gilmore  
 Title: United STATE MARSHAL / Head Marshal  
 Place of Employment: United State Marshal of the Northern District
- B. Defendant: David Harlow  
 Title: Deputy Director  
 Place of Employment: United State Marshal of the Northern District
- C. Defendant: Thompson C  
 Title: United State Marshal  
 Place of Employment: Great Lakes Regional Fugitive Task Force

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



- D. Defendant: Sledge E  
Title: United State Marshal  
Place of Employment: Great Lakes Regional Fugitive Task Force
- E. Defendant: Cundiff M  
Title: United State Marshal  
Place of Employment: Great Lakes Regional Fugitive Task Force
- F. Defendant: Gonzalez N  
Title: United States Marshal  
Place of Employment: Great Lakes Regional Fugitive Task Force
- G. Defendant: Grimaldo D  
Title: United States Marshal  
Place of Employment: Great Lakes Regional Fugitive Task Force
- H. Defendant: Zitsch P  
Title: United States Marshal  
Place of Employment: Great Lakes Regional Fugitive Task Force
- I. Defendant: Coleman LR #1233  
Title: Sergeant  
Place of Employment: Chicago Police Department
- J. Defendant: Keller JL #16173  
Title: Detective  
Place of Employment: Chicago Police Department



Defendant:  
K. Tracy, JL # 16173

Title: Detective

Place of Employment: Chicago Police Department

L. Defendant: Hoffman John # 20077

Title: Detective

Place of Employment: Chicago Police Department

M. Defendant: IGNAWSKI JS # 20052

Title: Detective

Place of Employment: Chicago Police Department

N. Defendant: Vargas T # 10331

Title: Detective

Place of Employment: Chicago Police Department

O. Defendant: Murphy BC # 10545

Title: Detective

Place of Employment: Chicago Police Department

P. Defendant: Munizzi, AF # 15447

Title: Detective

Place of Employment: Chicago Police Department



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III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Ardamis Darrell Sims v. County of Cook  
Former Superintendent, et al 1:16-cv-10816
- B. Approximate date of filing lawsuit: November 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
N/A
- D. List all defendants: Plaintiff can't recall all the names, Plaintiff has  
lost property inside the Jail as well as plaintiff is indigent and could  
not afford copies of Complaint
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICT
- F. Name of judge to whom case was assigned: Judge Milton I. Shadur  
Magistrate Judge Maria Valdez PCB
- G. Basic claim made: Fourth Amendment Violation / Unlawful Search And  
Seizure
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending
- I. Approximate date of disposition: Still Pending

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



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**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Ardamis Darrell Sims v. Owner  
John Doe, et al
- B. Approximate date of filing lawsuit: November 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
N/A
- D. List all defendants: Plaintiff can't recall all the names, Plaintiff  
has lost property inside the jail as well as plaintiff is indigent  
and could not afford copies of Complaint
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): NORTHERN DISTRICTS
- F. Name of judge to whom case was assigned: Judge Sara L. Ellis  
Magistrate Judge Young B. Kim #102
- G. Basic claim made: Fourth Amendment Violation
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending
- I. Approximate date of disposition: Still Pending

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Archie Darrell Sims v. County of Cook et al  
~~1:16-cv-10768~~ 1:16-CV-10767
- B. Approximate date of filing lawsuit: ~~November of 2015~~ November 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
N/A
- D. List all defendants: Plaintiff can't recall all the names, Plaintiff  
has lost property inside the Jail as well as plaintiff is indigent and  
could not afford copies of Complaint
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District
- F. Name of judge to whom case was assigned: Judge Virginia M. Kendall  
Magistrate Judge Susan E. Cox PC7
- G. Basic claim made: Injury, Living Conditions et al
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending
- I. Approximate date of disposition: Still Pending

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



- 4 of 6 of the page
- III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:
- A. Name of case and docket number: Adonis Darrell Sims v. Sheriff  
Officer Lee, et al 1:16-cv-10766
- B. Approximate date of filing lawsuit: November 2016
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_  
\_\_\_\_\_  
N/A
- D. List all defendants: Plaintiff can't recall all the names, Plaintiff has  
lost property inside the Jail as well as plaintiff is indigent and  
could not afford copies
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District
- F. Name of judge to whom case was assigned: Judge Virginia M. Kendall  
Magistrate Judge Susan E. Cox PC7
- G. Basic claim made: Denying Medical Treatment
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still Pending
- I. Approximate date of disposition: Still Pending

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



- 5 of 6 of this page

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: Ardamis Darrell Sims vs. Warden Hardy et al (I believe, 11cv955)
- B. Approximate date of filing lawsuit: I believe 2008 or 2009 Aug
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: Marcus Hardy of Stateville Warden, Warden of Jolietville. I can't remember any more names
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Southern District of East St Louis
- F. Name of judge to whom case was assigned: Judge Patrick G. Murphy
- G. Basic claim made: Over incarceration
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Dismissed
- I. Approximate date of disposition: August or October 2012 or 2014

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



- 6 of 6 of this page

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any State or federal Court in the United States:

A) Name of case and docket number: Ardamis Darrell Sims vs. Cook County, et al., Case No 1:15-CV-07524

B) Approximate date of filing lawsuit: November 2015

C) List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A

D) List all defendants: County of Cook, Marici of Cook County Jail, Sgt Cornelius of Cook County Jail. Superintendent, Garry McCarthy of Chicago Police Department, Detective John Doe and Partner John Doe of Chicago Police Department, 63rd St. Louis.

E) Court in which the lawsuit was filed (if federal court, name the district; if state court, name the County): NORTHERN DISTRICT OF ILLINOIS

F) Name of Judge to whom case was assigned: Honorable Ruben Castillo

G) Basic claim made: Excessive Force

H) Disposition of this case (for example: IS IT STILL Pending? (YES)

I) Approximate Date of Disposition: Still pending.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

This was model with the help of "Derrick Williams" a detainee... On December 19 2014, Plaintiff "Ardamis Darrell Sims" was arrested at the Amber INN Motel located at 3901 S. Michigan Chicago IL at 10:Am Where law officials using the motel keycard burst through Plaintiff motel room brandishing assault rifles and carrying a battering iron. Plaintiff was in the state of undress with a lady occupant. At the time of plaintiff arrest plaintiff wasn't committing any crime, Plaintiff wasn't fleeing, law officials wasn't in hot pursuit and neither did plaintiff know of these officials presents before they unlawfully enter without first knocking and announcing their authority. There was no felony arrest warrant for plaintiff arrest. This was an illegal and or unlawful arrest. Plaintiff was arrested as above stated for an investigative Alert # Under #299985491 which ultimately wasn't processed. However, Plaintiff rented a motel room on the 18 Dec 2014 for an overnight stay where it was recorded that plaintiff only left the room the next day at 6:00Am and returned 45 minutes later with no incident where plaintiff remained with lady occupant whom plaintiff rented the room for an overnight stay. The arrest report: was recorded under CB 19031338, RD #545213, Event #1435-101792: The incident narrative, states as follow: This is an arrest by Fugitive Apprehension Unit US Marshal's Great Lakes Regional Fugitive Task Force



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

The above was arrested under IA#299985491 after being positively identified as the individual who robbed the 7-11 located at 180 N. Franklin St. with a handgun on 05 Dec. 14 at 0444 hrs. Taken was \$20.00 US\$. The above offender is believed to be the offender responsible for a Pattern of robberies in the 001st and 8th Districts reported under RD's HX545213, HX543733, HX525751, HX517779, HX107735, HX117443, HX530711, HW572284 and HW588532. Pattern number P14-1-292. The above is not on Gipp, 2 Degrees, Parole or Probation. Area Central Detectives notified SGT COLEMAN#1233. Scene Processed BT 5832 VERA#11421... Initial Investigation leading to arrest" Under HX545213 RD's were assigned to conduct an investigation into an armed robbery with one offender in custody in the 002nd district arrested under investigative alert with Probable Cause for arrest#299985491. R/D along with Det. Reilly#21263, Det. Blum#20917, Sgt. Coleman#1233, Det. IGnowski#20052, Det. Keller#21002, Det. Calle#20177 and Sgt. Garcia#2430 realized that this offender was responsible for multiple Armed Robberies Under Area Central Crime Patterns# P14-1-292 and P14-1-294. RD's investigation revealed that the offender was arrested at the Amber Inn located at 3901 South Michigan and that he was in possession of a gray Plymouth Breeze. Illinois plate SA92214. Det. Keller#21002 generated a search warrant for above vehicle. A search of the vehicle revealed an alleged gray jacket that the offender wore in the surveillance video from this 7-Eleven. A plastic airsoft gun was also recovered from the vehicle which resembled a sawed off shotgun.

### STATEMENT OF FACTS

This arrest was unlawful in violation of the "Knock and Announce Rule" stemming from an alleged investigative alert. The language states, An INVESTIGATIVE Alert, by "Special Order of S04-16" Introduces the "Criminal History Records Information System" known as (CHRIS) investigative alert application System to be utilized by the "Bureau of Investigative Services" (BIS).

Under the CHRIS INVESTIGATIVE ALERT APPLICATION System... All request for investigative alerts are entered and approved in CHRIS by Sworn BIS Personnel. The language states in item II-B Supervisors will approve or reject investigative alert request in (CHRIS). The language also states "Responsibilities" section III (A) 1 That Bureau of Investigative Services supervisors will ensure that: 1. A unit investigative alert file is maintained. The investigative alert file will contain sufficient information relating to the Subject of the alert to allow any member of the investigating unit to handle the investigation if the requesting member is not available. Copies of all reports, documents, etc., Supporting the investigative alert request and a summary of how the Subject was involved in the Crime or incident will also be included in the investigative alert file. The language also states in #3-(C)(3) That the Bureau of Investigative Services Sworn members will: Ensure that a Supervisor is notified in the event an investigative alert is to be updated or, canceled (if, additional information is available, [a warrant has been served, and the investigative alert is no longer necessary) Complaint/witness is no longer available, etc. The investigative alert under IA#299955491 that was only a request was suspended by R/O's whom requests this case to be suspended Pending further investigative leads or information under Supplementary Report HK530711



As reported by Det Hoffman ~~work~~ John #20077 and printed by Central Detective Division Property Crimes / RBT 001st District Det. Reilly #21263 This arrest to the plaintiff was carried out by both Chicago Police and US Marshall's as stated by assistant States attorney Natalie House (IL016SAAVQ) on August 29, 2016 in front of Judge Neera Walsh 1969 Court room #201 inside the Criminal Court building of 26th and California Chgo IL 60608. Ms House stated that C.P.D. members also can carry with them the Capacity of U.S. Marshal, as well as assistant states attorney "Natalie House," Stated on Aug 29th 2016 that no supervisor approved the "investigative alert" that these officials falsely reported ~~that the vehicle was searched due to a search warrant~~ ~~that was in effect.~~ These officials also reported falsely that the vehicle that was searched due to a search warrant was linked to a robbery see (EXHIBIT A) This was obtained due to perjury testimony by "Det Keller," who may also be a member of BIS and as a U.S Marshal page 3 of 5 bottom paragraph of the search warrant sworn to by Det Keller. #21002 Det Keller states as follow: I have obtained the information contained in this affidavit from conversations with Circumstantial witnesses and other law enforcement officers involved in this "investigation, from my Personal knowledge, from my Participation in this case, as well as from documents I have reviewed, and my Prior training and experience. The following information contained in this affidavit is stated for the limited purpose of establishing Probable Cause and does not contain all facts and information regarding

this investigation. On page #4 of 5 Det Keller, committed perjury by testifying  
 to information he new to be false of all said robberies and bottom  
 Paragraph of page #4 of 5 he states on Dec 17 2014, 0515 hrs.  
 Ardamis L Sims entered the 7-11 convenience store located at 6559  
 W. Archer Ave., Chgo IL displayed a handgun and demanded money  
 from the cash register. Sims was given approximately \$150.00 USC  
 and retrieved "NewPort" Cigarettes. Investigation revealed that Sims  
 used a gray colored vehicle in the Commission of the robbery. This  
 incident was captured on video surveillance which was subsequently  
 provided to fellow detectives. These officials has fabricated this report Det  
 Keller misled the court into issuing a search warrant to a vehicle that  
 didn't exist in any robbery nor that was captured by video or said to be  
 the vehicle to any robbery see under RD# HX530711 and inventory no:  
 To Vides 13334260 that no vehicle or plaintiff is the said perpetrator  
 to these ~~entire~~ allege crimes... See also RD# HX545213 and recordings  
 Audio/Visual: CD under (inv no:) 13335248 that will clearly exonerate  
 plaintiff as well as show the perjury committed in the arrest report  
 of C.P.D as well as U.S. Marshal, Fugitive Apprehension Unit of  
 Great Lakes Regional Fugitive Task Force. No Investigative Alert existed to  
 justify these officials unlawful entry. There was no Exigent Circumstances,  
 Plaintiff was in a none moving Place of resident as an overnight guest at the  
 Amber Inn, There also is no Confidential Informants reported to have



linked plaintiff (whereabouts) to the "Amber Inn" NOR any Circumstantial Witnesses reported to have said plaintiff was committing or has committed a crime and that plaintiff was held up in a motel.

Per investigation by Det Ignowski #20052 who may as well also be of U.S. Marshal Capacity. Reported from Erica Graham Allegedly that Plaintiff Solicited a sex act from her and rented a motel room where she and Plaintiff remained overnight see (Exhibit B) This is the only recorded statement of plaintiff being linked to the Amber Inn Motel. Detective Keller also stated that P.O. Heskin recovered the Video Surveillance and Compiled a Crime bulletin see "EXHIBIT C" which will further support Plaintiff showing of these officials acts of perjury as well as plaintiff also can establish harassment due to again falsity of reports by Detective Hoffmann #20077.

In Summary R/D's on February 05, 2014 conducted a search allegedly for a Possible offender using data warehouse. These officials Det. Reilly #21263 and Det Hoffmann #20077 Constructed numerous cases where plaintiff was alleged to have been Suspected of these alleged robberies. Plaintiff was never identified as the Perpetrator of the Crime Pattern that was alleged to have been committed under #P14-1-001B nor was plaintiff in Possession of any of the clothing that was described of the perpetrator. The Perp, in those said robberies wore a SKI Mask. In fact Det Reilly #21263 the Same officer attempted to tie the Plaintiff to a prior robbery to the same location 180 N. Franklin St as he Det Reilly attempted under HX107735 back in January of, 2014.

Where plaintiff, was not identified as the suspect and also where the robbery that was alleged to have been committed by Plaintiff on January 17 2014 In the village of Forest view as reported by Det Hoffmann #20077 Plaintiff was exonerated, video from that incident fully exonerated plaintiff.

Plaintiff is also requesting that this Court investigate this case in Criminal Court and Place an order of protection against Det Reilly #21263 and all officials



Pertaining to this instant case.

### Conclusion:

As Stated by assistant States Attorney Natalie House (IC016SAAVQ) C.P.D involved in this Case are also able to hold the Capacity of U.S. Marshal's. These officials responsible for plaintiff illegal arrest are Tracy, JL #20052 #16173, Munizzi AF #15447, Vargas, T #10331, Murphy, RC 10545, Janowski JS #20052, CAME, DL #20177, Sherlock, JP #20212 Ross, CM #20518, Feltman DF #20518 #20613, Keller JT #21002, Garcia, JS #2430, Gorman TE #3156, Foley JT #3966.

These are Presumably the U.S Marshal's: "Thompson J," "Sledge E," Cundiff, M Gonzalez N, "Grimaldo D" Zitsch P."

There was no justification to plaintiff arrest, there was no (Hot Pursuit) nor was plaintiff in flight and plaintiff was completely Surrounded by agents before plaintiff even knew of their presence. There was No Felony arrest warrant, these officials U.S Marshal's along with C.P.D failed to knock and announce their authority before bursting in Plaintiff motel room brandishing assault rifles where these officials then cuffed plaintiff after letting him put pants on from being in the state of undress and then these officials ushered plaintiff out of the motel room with no shoes into freezing weather into a park S.W. As Plaintiff Watch these officials search a park brown vehicle inside the Amber INN parking lot. These officials violated plaintiff rights guaranteed by the Fourth, Fifth, Sixth and Fourteenth Amendments to the U.S Constitution Article I, Sections 2, 6, 8, and 12 of the Constitution of the United State of Illinois and Illinois Supreme Court Rules. In furtherance United States Marshal's Edward Gilmore and United States Marshal deputy director David Harlow are responsible because they fail to Supervised they Super Subordinates in their Official duties. Wherefore



110

Wherefore Plaintiff demands judgement against defendants with interest for actual and Consequential damages, Punitive and exemplary damages; and any other relief deemed by the trier of fact to be just fair and appropriate.



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

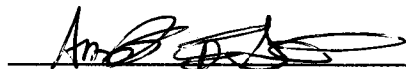
Wherefore Plaintiff demands judgement against defendants with interest  
for actual and consequential damages, Punitive and Exemplary damages,  
and any other relief deemed by the trier of fact to be just fair and appropriate

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this December day of 12, 20 16



(Signature of plaintiff or plaintiffs)

Ardamis Darrell Sims

(Print name)

#20141221052

(I.D. Number)

P.O. Box 089002

Chicago ILL 60688

(Address)



Pg = 27 =  
EXHIBIT "C"

narrative of RD #HX-545213.

This report is only a summary and not a verbatim statement unless otherwise noted and should be read in conjunction with above listed record division report numbers.

R/d was assigned these investigations by Sgt. Teneyuque of this command.

On 17 Dec 2014, R/d was assigned an Armed Robbery investigation of 7-11 store located at 655 W. Archer with the Robbery occurring at approximately 0515 hours in the morning. R/D relocate to the store and interviewed SUKHAVASI who related that he was working as the clerk in the store by himself when a male black, N.K.A. Ardamis SIMS along with an unknown female black entered the store thru the front doors. SUKHAVASI related the female stayed near the door while SIMS approached the counter and asked for Newport 100's cigarettes and SUKHAVASI got a pack of cigarettes and placed same on the counter. SUKHAVASI further related that SIMS then asked for another pack of cigarettes and at this time SIMS picked up his shirt and displayed a gun which SUKHAVASI thought was in a holster, and that the color of the gun was black. SUKHAVASI related that SIMS then demanded the cash from the register and to put SUKHAVASI to place his hands down and that SUKHAVASI then gave the cash to SIMS. SUKHAVASI related that SIMS then walked to the end of the front counter and ordered SUKHAVASI into the rear room and at that time SUKHAVASI refused to go in the room. SUKHAVASI related that after refusing, SIMS walked behind the counter and then SUKHAVASI then entered the rear room after SIMS stated "I'll shoot you". Once inside the rear room, SUKHAVASI then had to lay on the floor and at that point SIMS exited the room and closing the door to the rear room.

The video for this was recovered by P.O. Heskin on 17 Dec 2014 with this being inventoried by P.O. Heskin. P.O. Heskin after recovering the video compiled a Crime Information Bulletin placing two different images of SIMS along with two different images of the unknown female. The images that were placed on the Crime Information Bulletin were recovered from the video surveillance of the Robbery recorded under RD#HX545213. P.O. Heskin distributed this Crime Information Bulletin on to CPIC who then placed the bulletin on the administrative message for Law enforcement.

On 17 Dec 2014, Det. Blum notified R/D after he had viewed the Crime Bulletin depicting the images that had been recovered during the video surveillance of the incident recorded at 7-11 recorded under RD#HY545213. Det. Blum informed R/D that the subject in the bulletin matched that of a subject that Det. Blum had previously identified in a similar incident recorded in the 001st district. Det. Blum informed R/d that there was an investigative alert issued for Ardamis SIMS IR#1184362 with the images matching the demographics as depicted in the Bulletin issued by P.O. Heskin.

R/d conducted a search for SIMS which revealed that SIMS has similar demographics matching that of the offender in multiple store robberies. A further search revealed that Det. Riley issued an Investigative alert #299985491 which revealed that SIMS had been identified as the offender who was identified as a Robbery offender recorded under RD#HX530711.

R/D compiled a photo array and conducted multiple photo arrays on 17 and 18 Dec 2014 regarding City wide Pattern P14-1-294. (SEE LINE-UP SUPPLEMENTARY REPORTS)

EXHIBIT

(A) B

EXHIBIT (A) B

GENERAL PROGRESS REPORT  
DETECTIVE DIVISION/CHICAGO POLICE

OFFENSE CLASSIFICATION—LAST PREVIOUS REPORT

Armed Robbery

VICTIM'S NAME AS SHOWN ON CASE REPORT

7-1

DATE OF ORIG. CASE REPORT

05 DEC 14

DATE OF THIS REPORT

19 DEC 14

BEAT/UNIT ASSIGNED

5101

This form is designed for recording handwritten notes and memoranda which are made during the conduct of investigations, including: inter-watch memoranda (handwritten or typewritten), witness and suspect interview notes, on-scene canvas notes, and any handwritten personal notes made by detectives during the field investigation of violent crimes which are used to prepare official Department case reports.

19 Dec 14

131 hrs

Keller / Ignanski

Graham, Eric Loren

F/2/30

27 Nov 84

- Related that she sold CD's at 47th + Ashland
- Graham was at 47th + Ashland yesterday (18 Dec)
- when the D male black subten. picked her up in a gray car. This was around 2:30 - 3:00 pm.
- He ~~was~~ Solicited a sex act from her.
- He drove her to a Restaurant to order food
- He drove her to a hotel on Pershing - (Amber Inn)
- between Michigan + Indiana.
- Parked the gray vehicle and he rented a motel room
- They went to the motel room as D carried a black colored computer bag.
- They stayed in hotel room all night
- D left room at approx. 0645 hrs.

REPORTING OFFICER'S SIGNATURE—STAR NO.

RECEIVED BY: SUPERVISOR'S SIGNATURE—STAR NO.

DAY—MO.—YR. TIME

20/2  
EXHIBIT  
(A)EXHIBIT  
(A)GENERAL PROGRESS REPORT  
DETECTIVE DIVISION/CHICAGO POLICEDATE OF ORIG. CASE REPORT  
DAY MONTH YEARDATE OF THIS REPORT  
DAY MONTH YEAR WAT

OFFENSE CLASSIFICATION—LAST PREVIOUS REPORT

VICTIM'S NAME AS SHOWN ON CASE REPORT

05 DEC 14

19 DEC 14

BEAT/UNIT ASSIGNED

5101

This form is designed for recording handwritten notes and memoranda which are made during the conduct of investigations, including: inter-watch memoranda (handwritten or typewritten), witness and suspect interview notes, on-scene canvas notes, and any handwritten personal notes made by detectives during the field investigation of violent crimes which are used to prepare official Department case reports.

- They stayed in hotel room until Police came.
- Graham related that he had brought all the items he had into the room from their blk computer bag.
- When Police arrived, Graham pointed out the greyish-greenish car that the Δ picked her up in and drove her to the hotel. The car was parked in the lot of the hotel.
- Graham observed a BLK car + a grey car inside the vehicle.

REPORTING OFFICER'S SIGNATURE—STAR NO.

RECEIVED BY: SUPERVISOR'S SIGNATURE—STAR NO.

DAY—MO.—YR. TIME



EXHIBIT  
(A)EXHIBIT  
(A)GENERAL PROGRESS REPORT  
DETECTIVE DIVISION/CHICAGO POLICEDATE OF ORIG. CASE REPORT  
DAY MONTH YEAR

05 DEC 14

DATE OF THIS REPORT  
DAY MONTH YEAR WAT

19 DEC 14 13

OFFENSE CLASSIFICATION—LAST PREVIOUS REPORT

VICTIM'S NAME AS SHOWN ON CASE REPORT

BEAT/UNIT ASSIGNED

ARMED ROBBERY

7-011

5101

This form is designed for recording handwritten notes and memoranda which are made during the conduct of investigations, including: inter-watch memoranda (handwritten or typewritten), witness and suspect interview notes, on-scene canvas notes, and any handwritten personal notes made by detectives during the field investigation of violent crimes which are used to prepare official Department case reports.

OFF. MIRANDIZED 1933 HRS  
CB# 19031338

ARDAMIS SIMS

- "DO NOT WANT TO TALK"

- PROVIDED BOTTLE OF WATER &amp; BAG OF FRITOS

R.D.  
NO.

HX 530711

\*DET. HOFFMANN #28079 PRESENT

REPORTING OFFICER'S SIGNATURE—STAR NO.

RECEIVED BY: SUPERVISOR'S SIGNATURE—STAR NO.

DAY—MO.—YR. TIME

D-23.122 (Rev. 2/83)

Det. Hoffmann #21263

Sgt. Callahan 1233

19 DEC 14 1200

EXHIBIT A

PROGRESS REPORT  
DIVISION/CHICAGO POLICEDATE OF ORIG. CASE REPORT  
DAY MONTH YEARDATE OF THIS REPORT  
DAY MONTH YEAR WA

CLASSIFICATION—LAST PREVIOUS REPORT

VICTIM'S NAME AS SHOWN ON CASE REPORT

BEAT/UNIT ASSIGNED

Armed Robbery

7-11

15701

This form is designed for recording handwritten notes and memoranda which are made during the conduct of investigations, including: inter-watch memoranda (handwritten or typewritten), witness and suspect interview notes, on-scene canvas notes, and any handwritten personal notes made by detectives during the field investigation of violent crimes which are used to prepare official Department case reports.

Search Warrant for X's Vehicle

Apprized: 1830 December 19, 2014.

ASA Todd Kleist

145W 8267

Signed by

Judge Champas #1949

December 19, 2014 at 7:57 pm

Entered at 19 Dec 2014

2035 hrs at

10300 S. Doty

REPORTING OFFICER'S SIGNATURE—STAR NO.

RECEIVED BY—SUPERVISOR'S SIGNATURE—STAR NO.

DAY—MO.—YR. TIME

A. K. Kline

21002

Sgt. Calabrese

1233

19 DEC 14 1200

12/19/2014 19:57 FAX  
DEC-19-2014 19:33

From: 312

0002/0001

Page: 2/5

EXHIBIT (B)

Page 1

(3-81) CCMC-1-

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

The People of the State of Illinois to all peace officers of the state and their designees

## SEARCH WARRANT

On this day, Detective Joel KELLER #21002, Chicago Police Department Area Central Detective Division, Complainant has subscribed and sworn to a complaint for search warrant before me. Upon examination of the complaint, I find that it states facts sufficient to show probable cause.

## and the premises:

A grey colored 2000 Plymouth Breeze 4-door sedan vehicle bearing Illinois license plate number S492214 Vehicle Identification Number 1P3EJ46X7YN134758 belonging to Christena L. CHAIRS of 9404 S. Yale Ave, Chicago, IL 60632.

## and seize the following instruments, articles and things:

Any and all evidence related to the Armed Robbery-Handgun investigation of the 7-11 store located at 180 N. Franklin St, Chicago, IL 60606, the 7-11 store located at 6559 W. Archer Ave, Chicago, IL on December 17, 2014, and the Little Caesar restaurant located at 2906 W. 63<sup>rd</sup> St, Chicago, IL on December 13, 2014. Including but not limited to any physical evidence and proceeds in the vehicle contained within the driver and passenger compartments, such as clothing, fingerprints, proceeds, and any firearm evidence.

ON DECEMBER 5, 2014

which have been used in the commission of, or which constitute evidence of the offense of:

Armed Robbery-Firearm  
720ILCS 5/18-2-A-2

I further command that a return of anything so seized shall be made without necessary delay before me or before:  
Judge

JUDGE

Judge's No.

Date and time of issuance:

December 19, 2014 at 7:57pm

Approved 15W8267 12/19/14 1830hrs ASA Todd Kloister (12) Sgt. Z. Adams 1233



EXHIBIT

11

page 1 of 1

42

COURT BRANCH

COURT DATE

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

STATE OF ILLINOIS  
COUNTY OF COOK

(3-81) CCMC-1-2  
THE CIRCUIT COURT OF COOK COUNTY

### COMPLAINT FOR SEARCH WARRANT

Detective Joel KELLER #21002, Chicago Police Department Area Central Detective Division, Complainant now appears before the undersigned judge of the Circuit Court of Cook County and requests the issuance of a search warrant to search:

and the premises:

A grey colored 2000 Plymouth Breeze 4-door sedan vehicle bearing Illinois license plate number S492214 Vehicle Identification Number 1P3EJ46X7YN134758 belonging to Christena L. CHAIRS of 9404 S. Yale Ave, Chicago, IL 60632.

and seize the following instruments, articles and things:

Any and all evidence related to the Armed Robbery-Handgun investigations of the 7-11 store located at 180 N. Franklin St, Chicago, IL 60606 on December 05, 2014, the 7-11 store located at 6559 W. Archer Ave, Chicago, IL on December 17, 2014, and the Little Caesar restaurant located at 2906 W. 63<sup>rd</sup> St, Chicago, IL on December 13, 2014. Including but not limited to any physical evidence and proceeds in the vehicle contained within the driver and passenger compartments, such as clothing, fingerprints, proceeds, and any firearm evidence.

which have been used in the commission of, or which constitute evidence of the offense of:

Armed Robbery-Firearm  
720ILCS 5/18-2-A-2

Complainant says that he has probable cause to believe, based upon the following facts, that the above listed things to be seized are now located upon the person and premises set forth above:

I, Detective Joel KELLER #21002, your affiant, am a Chicago Police Detective assigned to the Area Central Detective Division. Your affiant has been a member of the Chicago Police Department for more than fifteen (15) years. During those fifteen (15) years your affiant has conducted numerous investigations which have led to the arrests and convictions of those persons being investigated.

I have obtained the information contained in this affidavit from conversations with circumstantial witnesses and other law enforcement officers involved in this investigation, from my personal knowledge, from my participation in this case, as well as from documents I have reviewed, and my prior training and experience. The following information contained in this affidavit is stated for the limited purpose of establishing probable cause and does not contain all facts and information regarding this investigation.

Subscribed and sworn to before me on

December 19, 2014 at 7:57 pm

COMPLAINANT

JUDGE

Judge's No.

Sgt. Coleman 1233  
1830 hrs. ASA Todd Krest  
12/19/14  
Approved 1/18/15 267

EXHIBIT

(A)

42

COURT BRANCH

COURT DATE

page 2 of

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

STATE OF ILLINOIS  
COUNTY OF COOK

(3-81) CCMC-1-2

THE CIRCUIT COURT OF COOK COUNTY

## COMPLAINT FOR SEARCH WARRANT

On December 05, 2014, 0444hrs, Ardamis L. SIMS IR#1184362 entered the 7-11 convenience store located at 180 N. Franklin St, Chicago, IL and displayed a handgun inside of his waistband and demanded money from the cash register. Ardamis L. SIMS was given approximately \$20.00USC and "Newport" cigarettes. SIMS fled Northbound from location. SIMS was wearing a grey and black colored jacket. This incident was captured on video surveillance which was subsequently provided to fellow Detectives.

Your affiant and fellow Detectives learned that on December 15, 2014, Detective REILLY #21263 conducted a photo array with an eyewitness. The eyewitness positively identified Ardamis L. SIMS as the offender who entered the 7-11 convenience store located at 180 N. Franklin St, Chicago, IL on December 05, 2014, 0444hrs and displayed a handgun inside of his waistband and demanded money from the cash register and was given approximately \$20.00USC and "Newport" cigarettes. The details of this investigation were recorded under Chicago Police RD#HX-530711.

On December 13, 2014, 1613hrs, Ardamis L. SIMS entered the Little Caesar restaurant located at 2906 W. 63<sup>rd</sup> St. and announced a robbery while armed with a shotgun. Ardamis L. SIMS demanded money from inside a safe. SIMS was given approximately \$650.00USC and rolled coins. This incident was captured on video surveillance which was subsequently provided to fellow Detectives.

Your affiant and fellow Detectives learned that on December 18, 2014, Detective FREEMAN #20814 conducted (3) three photo arrays with eyewitnesses. The three (3) eyewitnesses positively identified Ardamis L. SIMS as the person who entered the Little Caesar restaurant and announced a robbery while armed with a shotgun. Ardamis L. SIMS demanded money from inside a safe. SIMS was given approximately \$650.00USC and rolled coins. The details of this investigation were recorded under Chicago Police RD#HX-540950.

On December 17, 2014, 0515hrs, Ardamis L. SIMS entered the 7-11 convenience store located at 6559 W. Archer Ave, Chicago, IL displayed a handgun and demanded money from the cash register. SIMS was given approximately \$150.00USC and retrieved "Newport" cigarettes. Investigation revealed that SIMS used a grey colored vehicle in the commission of the robbery. This incident was captured on video surveillance which was subsequently provided to fellow Detectives.

Your affiant and fellow Detectives learned that on December 18, 2014, Detective FREEMAN #20814

Subscribed and sworn to before me on

COMPLAINANT

JUDGE

Judge's No.

EXHIBIT

42

COURT BRANCH

Pg -24-  
COURT DATE

(A)

page 3 o

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

STATE OF ILLINOIS  
COUNTY OF COOK

(3-81) CCMC-1-2  
THE CIRCUIT COURT OF COOK COUNT

COMPLAINT FOR SEARCH WARRANT

conducted a photo array with an eyewitness. The eyewitness positively identified Ardamis L. SIMS as the offender who entered the 7-11 convenience store located at 6559 W. Archer Ave, Chicago, IL on December 17, 2014, 0515hrs, and displayed a handgun, demanded money from the cash register, and was given approximately \$150.00USC and retrieved "Newport" cigarettes. The details of this investigation were recorded under Chicago Police RD#HX-545213.

Your affiant and fellow Detectives learned that on December 19, 2014, Ardamis L. SIMS was located and placed into custody by members of the Chicago Police Department at the Amber Inn Motel Room #215 located at 3901 S. Michigan Ave, Chicago, IL. Your affiant and fellow Detectives learned that proceeds such as stacks of United States Currency, rolled coins, and packs of "Newport" cigarettes were observed inside the Amber Inn Motel Room #215.

A witness was also present with SIMS at the time of arrest. This witness identified to arresting officers the vehicle being used and driven by SIMS. The vehicle being a grey colored 2000 Plymouth Breeze 4-door sedan vehicle bearing Illinois license plate number S492214 Vehicle Identification Number 1P3EJ46X7YN134758 belonging to Christena L. CHAIRS of 9404 S. Yale Ave, Chicago, IL 60632. This vehicle was parked inside the parking lot of the Amber Inn Motel located at 3901 S. Michigan Ave. The vehicle was subsequently towed to 10300 S. Doty, Chicago, IL Police Pound 1 for further investigation.

Your affiant and fellow Detectives learned from witness interview that SIMS had picked up the witness while he/she was standing at 47<sup>th</sup> and Ashland on December 18, 2014 at approximately 2:30PM. SIMS was driving a grey colored vehicle. On December 18<sup>th</sup>, 2014, SIMS drove the witness to the Amber Inn Motel located at 3901 S. Michigan Ave, Chicago, IL. Inside the vehicle, a black colored coat and a grey colored coat were observed. SIMS rented a motel room and carried a black colored computer bag into Amber Inn Motel Room #215. All the items that SIMS brought into the Amber Inn Motel Room #215 were brought in by SIMS.

Based on the facts set forth in this affidavit, your affiant requests a warrant to search the grey colored 2000 Plymouth Breeze 4-door sedan vehicle bearing Illinois license plate number S492214 Vehicle Identification Number 1P3EJ46X7YN134758 belonging to Christena L. CHAIRS of 9404 S. Yale Ave, Chicago, IL 60632.

COMPLAINANT

Subscribed and sworn to before me on

December 19, 2014 at 7:57p

JUDGE

Judge's No.

#1949

Sgt. [Signature] 1233

ASA Todd [Signature]

12/30/14

12/19/14

MSW 8267

Approved





EXHIBIT

# CRIME INFORMATION BULLETIN

Attention 008<sup>TH</sup> DISTRICT PERSONNEL

FOR LAW ENFORCEMENT ONLY  
2014

17 December

The pictured male black and female black are wanted for several armed robberies that have occurred in the 008h district. Related RD #'s: HX545213, HX543733, HX525751, HX517779. In all instances, the offenders were wearing the same clothing. Three of the four robberies were located on the west end of 008.



The female offender stands by the door and acts as a look out as the male offender lifts his jacket up to show the clerk a concealed firearm located in his waistband. Male offender then demands the usc from the register. On several occasions, the male has ordered the victims into a back room. On one occasion, the offenders take Newport brand cigarettes along with usc. Any information should be forwarded to A/C/RBT, and the commanding personnel in the 008<sup>th</sup> district. No vehicle descriptions available. Offenders park away from the scene and enter on foot. In all instances the male offender wore a grey and black hooded jacket, black skull cap underneath, black or dark blue pants, and black shoes. In all instances, the female is observed wearing a white jacket with a fur lined hood.



ARDAMIS SIMS # 20141221052

P.O. Box 089002

Chicago Ill 60608



2016 DEC 19 PM 2:59

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12/19/2016-2

PRISONER CORRESPONDENCE

Office OF

CLERK OF THE U.S. DISTRICT COURT

UNITED STATES COURTHOUSE

Chicago Ill 60604

LEGAL MAIL

LEGAL MAIL



LEGAL MAIL

LEGAL MAIL